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JEKIELEK & JANIS LLP
ATTORNEYS & COUNSELORS AT LAW

December 10, 2020

SENT VIA ECF

Hon. Paul G. Gardephe, U.S.D.J.
United States District Court for the
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

RE: JOE HAND PROMOTIONS, INC. V. DANIEL SPIES, ET AL.;
CIVIL ACTION NO. 1:20-CV-06909-PGG

Dear Judge Gardephe:

This firm represents Plaintiff Joe Hand Promotions, Inc. ("Plaintiff") in the above-referenced action. In accordance with Local Rule 7.1(d) and Your Honor's Individual Rules & Practices in Civil Cases 1.A., Plaintiff respectfully requests the cancellation of the December 10, 2020 Deadline for filing a Joint Letter & Case Management Plan and Scheduling Order and Initial Pretrial Conference that is scheduled for December 17, 2020 at 11:00 a.m.

Plaintiff filed its Complaint on August 26, 2020 and Defendants were properly served with the Summons and Complaint on September 26, 2020. *See* Doc. Nos. 1, 11. Defendants were required to answer or otherwise respond to the Complaint by October 19, 2020. Defendants failed to answer or otherwise respond, and Plaintiff filed a Motion for Entry of Default as to Defendants on December 8, 2020. *See* Doc. Nos. 13-16. Default was entered against both Defendants on December 9, 2020. *See* Doc. Nos. 17-18. Plaintiff will file a Motion for Default Judgment against Defendants within 30 days of this letter which, after Your Honor's ruling, will close this matter.

Plaintiff hereby respectfully requests the December 10, 2020 Deadline for filing a Joint Letter & Case Management Plan and Scheduling Order and Initial Pretrial Conference be cancelled.

Thank you for your consideration on this matter.

Respectfully submitted,

/s/ Jon. D. Jekielek

Jon D. Jekielek, Esq.
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31 Cloverhill Place, Floor 1
Montclair, NJ 07042

MEMO ENDORSED:

The application is granted. The conference scheduled for December 17, 2020 is adjourned *sine die*. Plaintiff is directed to file any application for default judgment by January 9, 2020.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dated: December 11, 2020

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Attorneys for Plaintiff